

**REMARKS/ARGUMENTS**

Claims 1-28 stand in the present application, claims 7 and 15 having been amended. Reconsideration and favorable action is respectfully requested in view of the above amendments and the following remarks.

In the Office Action, the Examiner has rejected claims 1-9 under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicants regard as the invention. Although the Examiner has rejected claims 1-9, technical deficiencies have been identified only in claims 7 and 15. The technical deficiencies in claims 7 and 15 have been corrected as noted above. Accordingly, the Examiner's § 112, second paragraph, rejection of the claims is believed to have been overcome.

The Examiner has rejected claims 1-21 and 23-28 under 35 U.S.C. § 102(b) as being anticipated by Madrane and has rejected claim 22 under 35 U.S.C. § 103(a) as being unpatentable over Madrane. Applicants respectfully traverse the Examiner's §§ 102 and 103 rejections of the claims.

Independent claims 1 and 15 both require that, by having a user place a representation of a media object in a particular region of a display, (e.g., by "click and drag") a metadata tag associated with that region is applied to that object. Indeed, multiple copies of the representation may be used, each placed in a different region, so that several metadata tags can be applied to the same object. As described in the present specification, this process is more intuitive than applying a set of "labels" to each media object - the user is sorting the objects into categories (bins) rather than labeling them.

Madrane does not teach or suggest the above described feature of the present claims. The Examiner cites to a passage of Madrane bridging columns 13-14 together with Figures 17-18 which are described at columns 30 and 42, respectively. These passages are only remotely associated with each other. The cited passage at columns 13-14 describes the identification of objects that may be of interest in a set of images making up a movie sequence (for example an object moving across the field of view - see Fig 7A), such that they can be tracked across the sequence despite the fact that they do not appear in the same position in each image. Note that the designer of the interface, not the user, determines which objects are tagged in this way. Nowhere does this passage teach or suggest "allowing a representation of a selected media object to be moved into a region of the display representing a selected set of metadata tags" or "causing a set of metadata tags to be applied to the selected media object by placing a representation of the selected media object in a region of the display selected to represent the set of tags applied" as required by the present claims.

Figure 17 depicts how the position of such a tagged image is tracked across a series of images. "Metadata (represented by a title, a description and a URL) can be attached at different levels: at object annotation level, at the level of each object path or at the level of each bounding box." See Madrane at column 30, lines 11-14. However, nowhere does this passage teach or suggest "allowing a representation of a selected media object to be moved into a region of the display representing a selected set of metadata tags" or "causing a set of metadata tags to be applied to the selected media object by placing a representation of the selected media object in a region of the display selected to represent the set of tags applied" as required by the present claims.

Figure 18 is merely a screenshot depicting how the relevant program may be selected. Thus, the passage of Madrane describing Figure 18 also does not teach or suggest the above quoted portions of the present claims.

Applicants' invention is concerned with the manipulation of data, not of images per-se. There is nothing in Madrane providing for media objects to be tagged differently according to the region of the display in which the user chooses to position them (using an input device). Indeed, Madrane teaches the exact opposite in that it is important to Madrane's system that the same object, located in different positions in different frames, is identified as one and the same. Therefore, claims 1-28 are believed to patentably define over Madrane.

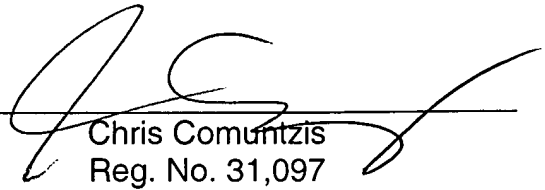
Therefore, in view of the above amendments and remarks, it is respectfully requested that the application be reconsidered and that all of claims 1-28, standing in the application, be allowed and that the case be passed to issue. If there are any other issues remaining which the Examiner believes could be resolved through either a supplemental response or an Examiner's amendment, the Examiner is respectfully requested to contact the undersigned at the local telephone exchange indicated below.

MENDIS et al  
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Respectfully submitted,

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